



THE UNITED STATES DISTRICT COURT

EX 1617  
3

UNITED STATES OF AMERICA

Plaintiff,

v.

ONE 1991 CHEVROLET CORVETTE,  
and \$22,522.00, MORE OR LESS, IN  
UNITED STATES CURRENCY

Defendant.

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CIVIL ACTION NO.

**AFFIDAVIT OF WAYNE GOOLSBY**

STATE OF ALABAMA     )  
                                      ) ss.  
COUNTY OF MOBILE    )

Personally appeared before me Wayne Goolsby, who being duly sworn, deposes and  
says:

My name is Wayne Goolsby and I am over the age of twenty-one. I have personal  
knowledge of the matters contained herein.

I am employed as a Deputy with the Mobile County Sheriff's Office ("MCSO"). My  
current assignment is to the Narcotics Division, where I have been assigned since 2001. During  
the more than 3 ½ years with the Narcotics Division I have worked exclusively on narcotics  
cases. While working on those cases I have had numerous occasions to observe suspected  
controlled substances later determined by lab analysis to be same including marijuana and

powder and crack cocaine. In my work as a narcotics investigator I have worked undercover and observed narcotics dealers and observed the methods and means by which they conduct business. In my undercover work, in the arrests of persons engaged in narcotics dealing and in my participation in the execution of numerous search warrants I have observed numerous objects of paraphernalia that narcotics dealers use to conduct business. I have also had numerous occasions to observe the paraphernalia that those who deal narcotics use to operate.

On March 5, 2003, I accompanied Cpl. Cuthkelvin and several other MCSO deputies and went to 928 Nellie Street to execute a search warrant. Approximately 15 people were outside the residence when we arrived.

Upon arrival, I saw two black males just inside the garage near its center partition. As I approached them, both black males began to move toward the center partition. I ran toward the individuals and took them both into custody. I later determined that the two individuals were Tavaris L. Body and Terrence C. King. I searched the garage. My search included inside the cinder block center partition where I had seen the above-named individuals move toward. This area is accurately depicted in Exhibit E-1. Inside the cinder block partition I found a greenish-brownish plant material in a plastic bag which appeared to be marijuana. This substance is accurately depicted in Exhibit E-2, attached hereto. Also depicted in Exhibit E-2 is what appeared to be a "blunt" based on its appearance and odor, which I also found in the cinder block. Based on my experience as a narcotics investigator a "blunt" is a hollowed-out cigar individuals use to smoke marijuana. I have smelled marijuana on numerous occasions and this

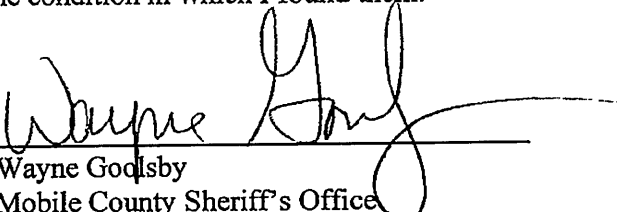
“blunt” smelled like marijuana. In the corner of the garage closest to Mr. Body’s house there is a wooden ledge that runs across the inside of the opening of the garage. There I also found a small bag of white powdery substance which appeared to be cocaine as accurately depicted in Exhibit E-3. I also found on the same ledge in the corner of the garage closest to 928 Nellie Street residence metal hand scales which are accurately depicted in Exhibit E-4.<sup>1</sup> The 928 Nellie Street is in the background of Exhibit E-4. I found a total of 3 sets of these hand scales hidden along this ledge.

I also found a pyrex measuring cup on top of the water heater in the back right-hand corner of the garage (which I have circled in Exhibit E-5). In the bottom portion of the pyrex cup I observed it to contain an off-white residue consistent with the appearance of cocaine. In my experience as a narcotics investigator including debriefing of individuals convicted of distributing crack cocaine and in the execution of search warrants I have become familiar with the methods and manner by which crack cocaine dealer cook crack cocaine. On numerous occasions I have found such containers with a similar residue. Narcotics dealers will often use such pyrex containers to cook crack cocaine in. Such containers can withstand high temperatures used to cook crack and the curved bottom of the containers makes it easier to remove the hardened “cookie” of crack cocaine once removed. The white Corvette depicted in Exhibit E-5 was parked in the garage with a car cover on it. Deputy Houseknecht brought in his canine partner “Otter” which I saw alert/scratch at the front driver’s side area.

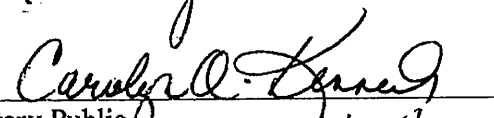
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<sup>1</sup> In my above-described law enforcement experience, I have many times seized these types of hand scales in connection with narcotics arrests I have made or in the execution of search warrants in which I have participated. Such hand scales are commonly used by narcotics dealers to weigh their controlled substances before distributing them.

I showed Cpl. Cuthkelvin where I found the above-described items and then relinquished custody and control of same to him in the same condition in which I found them.

  
Wayne Godlsby  
Mobile County Sheriff's Office

Subscribed and sworn to before me  
this 6th day of June, 2005.

  
Notary Public  
My Commission Expires: 6/28/2006